

1 KEKER & VAN NEST LLP
JOHN KEKER - # 49092
2 jkeker@kvn.com
DANIEL PURCELL - # 191424
3 dpurcell@kvn.com
EUGENE M. PAIGE - # 202849
4 epaige@kvn.com
633 Battery Street
5 San Francisco, CA 94111-1809
Telephone: 415 391 5400
6 Facsimile: 415 397 7188

7 Attorneys for Defendant
LUCASFILM LTD.

8
9 UNITED STATES DISTRICT COURT
10 NORTHERN DISTRICT OF CALIFORNIA
11 SAN JOSE DIVISION

12 IN RE: HIGH-TECH EMPLOYEE
ANTITRUST LITIGATION

13
14 THIS DOCUMENT RELATES TO:
15 ALL ACTIONS

Case No. 3:11-cv-2509-LHK

16 **LUCASFILM LTD.'S STATEMENT**
REGARDING REDACTIONS IN ITS
DOCUMENT PRODUCTION

Judge: Hon. Lucy H. Koh

17 Date Consol. Amended Compl. Filed:
September 13, 2011

18 Trial Date: November 12, 2013

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20 Pursuant to the Court's March 14, 2013 Case Management Order [Dkt. # 350], Defendant
21 Lucasfilm Ltd. ("Lucasfilm") makes the following statement regarding redactions based on a lack
22 of responsiveness or relevance, as opposed to redactions for privilege or privacy reasons.

23 Lucasfilm has produced 76,480 documents in this litigation, amounting to 221,115 pages.

24 To protect individual employees' privacy, Lucasfilm redacted from its compensation data
25 the names, compensation, and other similar information of Lucasfilm employees that Plaintiffs
26 have excluded from their class definition, including non-salaried employees (e.g., hourly or union
27 employees) and high-level executives. This category of redactions covered approximately 1,000
28 documents, the vast majority of which consisted of iterations of the same compensation

1 spreadsheet produced multiple times.

2 Lucasfilm also made a limited number of redactions for non-responsiveness when the
3 information in question solely concerned Lucasfilm's operations outside the United States (e.g.,
4 in Singapore or Canada). Because Plaintiffs' class definition has always excluded non-U.S.
5 employees, such information was not responsive to Plaintiffs' discovery requests. This category
6 of redactions covered approximately 200 documents.

7 Lucasfilm produced two redaction logs: one on July 16, 2012, and another on March 13,
8 2013. Because the above categories of information were not responsive to their discovery
9 requests, Lucasfilm did not log redactions for non-responsiveness. Instead, Lucasfilm logged
10 redactions for privilege, and, to the extent any document redacted for privilege also included a
11 redaction for non-responsiveness, Lucasfilm also noted the redaction for non-responsiveness in its
12 log.

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14 Dated: March 14, 2013

KEKER & VAN NEST LLP

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16 By: /s/ Justina K. Sessions
JUSTINA K. SESSIONS

17 Attorneys for Defendant
18 LUCASFILM LTD.
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